

Federal Defenders OF NEW YORK, INC.

Southern District
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September 2, 2021


BY EMAIL

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

REQUEST GRANTED.

The Court approves the modification to defendant's
bail conditions regarding travel as proposed.

9/3/2021 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

Re: United States v. Jesus Alberto Brito Maldonado
21 CR. 167 (LJL)

Dear Judge Liman,

I respectfully write on behalf of my client, Jesus Brito, to request that he be permitted to travel to the District of Pennsylvania for work from the evening of September 3 returning no later than September 6. Pretrial, as a matter of policy, does not consent but notes that Mr. Brito has been compliant with his conditions of release. The Government takes no position on this request and defers to Pretrial.

On 2/12/2021, the following bail conditions were set for Mr. Brito by Judge Gorenstein: \$50,000 PRB; 3 FRP'S; Travel Limited to SDNY/EDNY; Surrender Travel Documents (family must turn in his US and Dominican Passport); Pretrial Supervision As Directed by PTS; Deft to Submit to Urinalysis, If Positive, Add Condition of Drug Testing/Treatment; Home Incarceration; Electronic Monitoring; Deft Not to Possess Firearm/Destructive Device/Other Weapon. His conditions were modified shortly after his release to allow him to go to the hospital for the birth of his first child. Mr. Brito has been fully compliant with his conditions of release. His conditions were further modified to permit Mr. Brito's placement on a curfew enforced by electronic monitoring and to allow his travel to D N.J. for work.

I request that Mr. Brito be permitted to travel to the District of Pennsylvania for work. Mr. Brito is a baseball coach and trainer. One of the teams that he coaches and trains is scheduled to participate in the 2021 Tom Kerrigano Memorial Baseball Tournament in York, Pennsylvania. The tournament begins the morning of September 4 and ends September 6. I ask that the Court allow Mr. Brito to travel to York, Pennsylvania the evening of September 3 and remain there with his team for the duration of the tournament, until September 6. Mr. Brito would provide his itinerary and lodging to Pretrial Services in advance.

As mentioned above, Mr. Brito's Pretrial Officer, Mohammed Ahmed, reports that he has been compliant with his conditions of release.

Respectfully submitted,
/s/

Zawadi Baharanyi
Assistant Federal Defender
917-612-2753

cc: AUSA Jonathan Bodansky.